

## **EXHIBIT 2**

**CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF BRONX**

---

	X
SYNCHRONY BANK	:
	Index No.: 5361/23
Plaintiff,	:
	:
- against -	:
	ANSWER
	:
ERIKA WILSON,	:
	Defendant(s).
	:
	X

---

PLEASE TAKE NOTICE that Defendant Erika Wilson, by her attorney, Matthew Schedler, Esq., Of Counsel to Elizabeth Miller, Esq., CAMBA Legal Services Inc., hereby interpose the following Verified Answer to the Complaint:

1. Defendant lacks sufficient information to either admit or deny the allegations in paragraphs 1, 2, and 3 of the Complaint.
2. Defendant denies the allegations in paragraph 4 of the Complaint.
3. Defendant denies the allegations in paragraph 5 of the Complaint.
4. Defendant denies the allegations in paragraph 6 of the Complaint.
5. Defendant denies the allegations in paragraph 7 of the Complaint.
6. Defendant denies the allegations in paragraph 8 of the Complaint.
7. Defendant denies the allegations in paragraph 9 of the Complaint.
8. Defendant denies the allegations in paragraph 10 of the Complaint.
9. Defendant denies the allegations in paragraph 11 of the Complaint.

**DEFENSES**

**First Affirmative Defense**

10. The Court lacks personal jurisdiction over defendant because she was not properly served in accordance with C.P.L.R. § 308.

**Second Affirmative Defense**

11. The plaintiff lacks standing to bring this action.

**Third Affirmative Defense**

12. The defendant does not owe the debt.

**Fourth Affirmative Defense**

13. The defendant disputes the amount of the debt.

**Fifth Affirmative Defense**

14. The defendant is entitled to an offset against the amounts claimed because of plaintiff's failure to mitigate its damages.

**Sixth Affirmative Defense**

15. The statute of limitations has expired

**Prayer for Relief**

WHEREFORE, Defendant respectfully asks that the Court:

- A. Dismiss the Complaint in its entirety;
- B. Award defendant's reasonable costs and attorney fees; and
- C. Award such other and further relief as the Court deems just and proper.

Dated: August 21, 2023  
Brooklyn, New York

  
By: Matthew Schedler, Esq., Of Counsel  
CAMBA Legal Services, Inc.  
Elizabeth Miller, Esq., General Counsel  
20 Snyder Avenue  
Brooklyn, NY 11226  
(718) 940-6311, ext. 79222  
(347) 525-5072  
[matthewsc@camba.org](mailto:matthewsc@camba.org)  
*Attorneys for the Defendant*

**VERIFICATION**

State of New York      )  
                              ) ss.:  
County of Kings        )

The undersigned, an Attorney duly admitted to practice law in the State of New York, affirms pursuant to NY CPLR 3020 (d) (3) the following statements to be true under the penalties of perjury: That I am the Attorney of record for Defendant; That I have read and know the contents of the foregoing Answer; That same is true to the knowledge of the affirmant except as to those matters therein stated to be alleged upon information and belief and as to those matters I believe to be true. The reason this verification is made by the affirmant and not the Defendant is because the Defendant does not reside in the county where I maintain an office for the practice of law.



---

By: Matthew Schedler, Esq., Of Counsel  
Elizabeth Miller, Esq., Executive Director  
CAMBA Legal Services, Inc.  
Attorneys for Defendant  
885 Flatbush Ave. 2<sup>nd</sup> Fl.  
Brooklyn, NY 11226  
(718) 940-6311  
*Attorneys for the Defendant*

Dated: August 21, 2023  
Brooklyn, New York

**CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF BRONX**

Civil Court of the City of New York, County of Bronx,  
Index No.: 5361/23

---

**SYNCHRONY BANK**

Plaintiff,

-against-

**ERIKA WILSON**

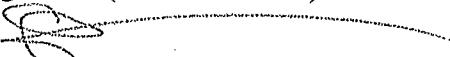
Defendant(s).

---

**ANSWER**

---

Signature (Rule 130-1.1-a)



Print name beneath

Matthew Schedler, Of Counsel

---

*Attorney for*

**CAMBA LEGAL SERVICES, INC.**

Elizabeth Miller, Esq., General Counsel

*Office and Post Office Address, Telephone*

20 Snyder Avenue

Brooklyn, New York 11226

718-940-6311 ext. 79222

---

To: Selip and Stylianou, LLP

199 Crossways Park Drive

Woodbury, NY 11797

Attorney(s) for Plaintiff

---

Service of a copy of the within is hereby admitted.

Dated,

---

\_\_\_\_\_  
Attorney(s) for